

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN**

JUAN RAYMUNDO LEMUS GUERRERO,  
JUAN ALDACO MIRANDA, ARTURO  
ROBERTO ALVAREZ-LOPEZ, ROBERTO  
SAIZ RODRIGUEZ, ARTEMIO CORIA-  
CASTRO, JUAN PABLO ESCAMILLA  
AVILA, AND RIGOBERTO MARTINEZ  
ROQUE, individually and on behalf of others,

Plaintiffs,

vs

BRICKMAN GROUP, LLC., a Delaware  
corporation, BRICKMAN ACQUISITIONS  
LTD., a Michigan corporation d/b/a  
LAKEWOOD LANDSCAPING, AMIGOS  
LABOR SOLUTIONS, INC., ROBERT  
WINGFIELD, JR., an individual, and  
JEFFREY WEST, an individual, and LLS  
INTL., INC., a Michigan corporation,

Defendants.

Case No. 1:05CV0357

Hon. Robert H. Cleland

**AMIGOS LABOR SOLUTION, INC.'S  
RULE 26(a) INITIAL DISCLOSURES**

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## **AMIGOS LABOR SOLUTIONS, INC.'S RULE 26(A) INITIAL DISCLOSURES**

Defendant Amigos Labor Solutions, Inc. (“Amigos” or “Defendant”) submits its initial disclosures pursuant to FED. R. CIV. P. 26(a).

### **A. Persons with Knowledge.**

Defendant identifies the following persons as potentially having knowledge of the subject matter of this case.

1. Juan Raymundo Lemus Guerrero - Plaintiff

Address and phone numbers are within Plaintiffs’ knowledge. Mr. Guerrero may have knowledge of claims in this lawsuit.

2. Juan Aldaco Miranda - Plaintiff

Address and phone numbers are within Plaintiffs’ knowledge. Mr. Miranda may have knowledge of claims in this lawsuit.

3. Arturo Roberto Alvarez-Lopez - Plaintiff

Address and phone numbers are within Plaintiffs’ knowledge. Mr. Alvarez-Lopez may have knowledge of claims in this lawsuit.

4. Roberto Saiz Rodriguez - Plaintiff

Address and phone numbers are within Plaintiffs' knowledge. Mr. Rodriguez may have knowledge of claims in this lawsuit.

5. Artemio Coria-Castro - Plaintiff

Address and phone numbers are within Plaintiffs' knowledge. Mr. Castro may have knowledge of claims in this lawsuit.

6. Juan Pablo Escamilla Avila - Plaintiff

Address and phone numbers are within Plaintiffs' knowledge. Mr. Avila may have knowledge of claims in this lawsuit.

7. Rigoberto Martinez Roque - Plaintiff

Address and phone numbers are within Plaintiffs' knowledge. Mr. Roque may have knowledge of claims in this lawsuit.

8. Robert Wingfield, Jr.  
President  
Amigos Labor Solutions, Inc.  
3141 Hood Street, Suite 440  
Dallas, TX 75219  
(214) 526-5665

Mr. Wingfield has knowledge of Amigos relationship with Lakewood Landscaping and the immigration related services that Amigos provided to Lakewood Landscaping. He also has knowledge of LLS Intl. Inc.'s activities in assisting Lakewood Landscaping in obtaining H-2B visa workers.

9. Anita Cruz  
Amigos Labor Solutions, Inc.  
3141 Hood Street, Suite 440  
Dallas, TX 75219  
(214) 526-5665

Ms. Cruz is a case manager for Amigos and has knowledge of its day-to-day operations and the administration of its immigration related services.

10. Jeff West  
LLS International  
427 Ocampo Pte. Zona Centro  
Monterrey, Mexico  
0115280180407577

Mr. West is an executive with LLS Intl. and may have knowledge of the identification, location and logistics of Lakewood Landscaping's employment of H-2B workers.

11. Bob McGuinness  
Lakewood Landscaping  
33306 Glenside  
Livonia, MI 48150  
(734) 422-3232

Mr. McGuinness was a manager for Lakewood Landscaping and would have knowledge surrounding the employment of those who may have worked for Lakewood Landscaping under H-2B visa authorizations.

**B. Documents.**

The following documents may be relevant to disputed facts alleged in the pleadings in this case.

1. Job Information Disclosure 1999/2000, 2000/2001, 2001/2002, 2002/2003, 2003/2004 and 2004/2005.
2. Cover letters to Job Information Disclosures.
3. Fee & Policy Agreements between Amigos and Lakewood Landscaping.
4. Description of H-2B visa program.
5. Agency and Indemnity Agreements between Amigos and Lakewood Landscaping.

**C. Damages.**

Not applicable.

**D. Insurance Agreements.**

None.

Respectfully submitted,

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By: /s/Charles H. Worsfold

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